

**Kramer Levin**

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September 25, 2024

**Via ECF**

The Honorable Christine P. O’Hearn, U.S.D.J.  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4<sup>th</sup> & Cooper Streets, Room 6050  
Camden, NJ 08101

Re: *Najjar v. Salameh, 1:24-cv-05043-CPO-EAP*

Dear Judge O’Hearn:

We represent Defendants Deloitte LLP and Deloitte & Touche LLP in connection with the above-referenced matter. We respectfully request that Your Honor permit Michael J. Dell, of Kramer Levin Naftalis & Frankel LLP, to appear *pro hac vice* on behalf of Deloitte LLP and Deloitte & Touche LLP. James E. Cecchi, Esq., counsel for plaintiffs, has consented to Mr. Dell’s appearance *pro hac vice*.

In support of this request, we enclose the following documents: (1) Certification of Michael Martinez; (2) Certification of Michael J. Dell with corresponding Certificates of Good Standing; and (3) a proposed form order. Thank you for your attention to this matter. If the Court has any questions, please do not hesitate to contact us.

Respectfully,

/s/ Michael Martinez  
Michael Martinez

cc: All counsel of record (w/encl.) (via ECF)